

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**U.S. BANK, NATIONAL
ASSOCIATION AS LEGAL TITLE
TRUSTEE FOR TRUMAN 2016 SC6
TITLE TRUST
Plaintiff,**

v.

**CANNOISE HARPER, L.J. HARPER,
JAMES HARPER, LEEVON HARPER,
CELETHA HARPER, THERESA
DEROSIN, SHERMAINE BARRY,
ETOSHIA WILLIAMS, CARLESTER
HARPER, JACKQUELYN
STRICKLAND, and ERICKA
JOHNSON,
Defendants.**

CIVIL ACTION NO. 3:21-cv-81

ATTORNEY'S FEE DECLARATION

STATE OF TEXAS §
COUNTY OF COLLIN §

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the following statements are true and correct:

1. "My name is Crystal Gee Gibson. I am over the age of 21 years and am fully competent to make this Declaration. All statements of fact made herein are true, correct, and within my personal knowledge.
2. I am a licensed attorney practicing in Texas. I handle cases in Dallas County and counties throughout Texas. I am familiar with the reasonable attorney's fees for cases involving excess proceeds and suits of this nature and a reasonable attorney fee in this matter would be \$3,010.00 plus \$2,540.09 in costs or \$5,550.09 for prosecution of this matter to Judgment. This amount is both reasonable in nature and necessary as a result of the litigation. This number represents actual attorneys' fees at the billable hour rate of \$215.00 per hour, which were incurred by Plaintiff through the course of this litigation. Plaintiff incurred these fees in all or in part by the following acts taken by its attorneys:

3. In connection with this lawsuit, I have spent time performing the following tasks:

10-29-2020: Review probate documents for heirs and addresses including heir of Geraldine Harper who died after probate was filed. Review AAL report and notice of appearance for Geraldine Harper's children. Review Dallas County for probate of Geraldine Harper. Draft federal petition seeking judicial foreclosure against numerous defendants who are heirs of Decedent. Request payoff and coordinate new default based on prior rescission. (4.0 hours)

10-30-2020: Confer with foreclosure regarding notice of default. Evaluate assignments. Review note for endorsement. Revise petition. (0.50)

11-16-2020: Review payoff. Finalize petition. (0.30)

01-14-2021: Draft motion to dismiss defendant Teresa Derosin as she is deceased. Review probate information for Teresa Derosin. Draft amended petition naming Teresa Derosin's heirs. (0.80 hours)

05-26-2021: Review process server's affidavit in support of substitute service. Draft motion to substitute service and order. (1.0)

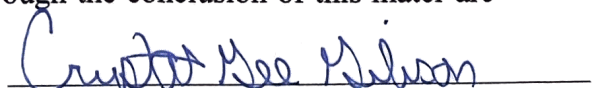
06-02-2021: Draft motion for clerk's entry of default, clerk's entry of default, motion for default, default judgment, servicemember's affidavit and attorney declaration for eleven (11) defendants. (4.2)

06-25-2021: Pursuant to FRCP 54(d), draft motion for award of attorney's fees and costs per court order. (2.7)

07-06-2021: Draft motion requesting clerk to enter default against Jackquelyn Strickland and order. Draft motion for entry of default judgment against Strickland and default judgment. Draft servicemember's affidavit and attorney Declaration. (1.5)

09-23-2021: Draft Second Motion for Award of Attorney's Fees and Brief in Support. Draft order and attorney fee declaration in support of motion. (1.5)

4. The Texas Civil Practices and Remedies Code §38.001 et. seq. provides for fair, usual, reasonable, and customary attorneys' fees in this matter. Reasonable attorney's fees and costs through the conclusion of this mater are \$6,888.00.



Crystal Gee Gibson

Date: September 23, 2021